

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)

IN RE:

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NKIAMBI JEAN LEMA

*

CASE NO. 18-23004 MMH

DEBTOR

*

CHAPTER 13

* * * * *

WORTHINGTON ALTERNATIVE CAPITAL, LLC*

MOVANT

*

v.

*

NKIAMBI JEAN LEMA

*

ROBERT S. THOMAS, II
CHAPTER 13 TRUSTEE

*

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RESPONDENTS

* * * * *

NOTICE OF INTENT TO INTRODUCE
CERTIFIED BUSINESS RECORDS IN EVIDENCE AT HEARING

Worthington Alternative Capital, LLC, (“Worthington”), by its undersigned attorneys serves notice of its intent to introduce the following certified business records, pursuant to Rules 803(6) and 902(11) of the Federal Rules of Evidence.¹

1. Records from Worthington Capital Alternative, LLC (“Worthington”) reflecting that Nkambia Jean Lema (the “Debtor”) executed a Promissory Note (the “Note”), on April 3, 2017, as evidence of a loan in the principal sum of \$260,000.00 (the “Note”), in favor of Worthington.
2. Records from Worthington reflecting that the Debtor executed a Deed of Trust, Security

¹ These materials are available to counsel for the Debtor. Movant has the Certification of Custodian and it is available to counsel for the Debtor. Movant reserves the right to amend this list if additional records are obtained before the hearing.

Agreement, and Assignment of Contracts, Leases and Rents (the “Deed of Trust”) dated April 3, 2017 for the benefit of Worthington and secured by 230 East 25th Street and 3605 Blair Avenue, which Deed of Trust was recorded among the Land Records of Baltimore City and among the Land Records of Baltimore County.

3. Records from Worthington reflecting that the total of the debt owed on the Note as of the Petition date, not including all of the costs and expenses of foreclosure, was \$270,846.76.
4. Records from Worthington reflecting that the amount of arrears accrued pre-petition on the Note is \$53,205.78, in pre-petition loan payments, plus pre-petition advances of \$9,532.71.
5. Records from Worthington reflecting that the amount of arrears accrued post-petition on the Note is \$87,532.20 in post-petition loan payments, plus post-petition advances of \$2,520.03.
6. Records from Worthington reflecting a history of the Debtor’s loan.
7. Records from Worthington reflecting a payoff of \$383,384.84 as of July 10, 2019.

/s/ Gordon B. Heyman
Gordon B. Heyman, Esquire
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Attorneys for Worthington Alternative Capital, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 12th day of July, 2019, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing Notice of Intent to Introduce Certified Business Records in Evidence at Hearing will be served electronically by the Court's CM/ECF system on the following:

Robert S. Thomas II
Chapter 13 Bankruptcy Trustee

Kim D. Parker, Esquire
Debtor's Attorney

I HEREBY FURTHER CERTIFY, that on this 12th day of July, 2019, a copy of the foregoing Notice of Intent to Introduce Certified Business Records In Evidence At Hearing was sent by first class mail, postage prepaid, to:

Nkiambi Jean Lema, 309 E. 25th Street, Baltimore, MD 21218, Debtor

/S/Gordon B. Heyman
Gordon B. Heyman